

Exhibit 22



Vanessa Baehr-Jones <vanessa@advocatesforsurvivors.com>

BP, HA, and SH v. City of Johnson City et al - Discovery Items - May 28

Vanessa Baehr-Jones <vanessa@advocatesforsurvivors.com>

Wed, Jun 12, 2024 at 12:23 PM

To: Emily Taylor <etaylor@watsonroach.com>

Cc: "elizabeth@eko.law" <elizabeth@eko.law>, "heather@hmccivilrights.com" <heather@hmccivilrights.com>, "kevin@eko.law" <kevin@eko.law>

Emily,

If you received a response to your email to DA Finney on which Plaintiffs' counsel was not copied, please provide it.

Thanks,
Vanessa

On Sat, Jun 1, 2024 at 2:54 PM Vanessa Baehr-Jones <vanessa@advocatesforsurvivors.com> wrote:

Emily,

To the extent the DA's office is asserting investigatory privilege over these documents, that privilege has been waived by their production. Moreover, "general routine information" about an investigation is "insufficient to justify indefinite secrecy." *United States v. Se. Eye Specialists, PLLC*, 586 F. Supp. 3d 787, 793 (M.D. Tenn. 2022). Particularly here, where B.P. has been waiting five years for her case to be prosecuted, there is no basis to continue to hide her reports from the public. Furthermore, I cannot fathom any legitimate reason why publishing her redacted report would in any way jeopardize the investigation where there are now images and videos of her rape. Finally, at this point, I have no confidence that the DA's office plans to bring indictments in my clients' cases, nor for that matter, in the cases of any of the 52+ Williams' sexual assault victims. Again, there are now images and videos of these women's assaults, which have been in the possession of the DA's office for over a year, and still no indictments have issued. If Defendants will not agree to de-designate these materials, we will bring a motion with the Court.

-Vanessa

On Sat, Jun 1, 2024 at 1:17 PM Emily Taylor <etaylor@watsonroach.com> wrote:

General Finney,

Below you will find a request I received from counsel for the Plaintiffs' in the B.P., H.A., and S.H. v. City of Johnson City et al case. Plaintiffs' counsel have asked to file the attached redacted case notes in a public filing. Although the documents have been redacted, since they pertain to active and pending investigations your office is conducting, I did not want to agree to make these public without approval from your office. Please advise on if these should be filed publicly or under seal. I have included Plaintiffs' counsel on this email so they will be informed of your response.

Thank you,

Emily Taylor

Emily C. Taylor

865-637-1700 (office)

865-525-2514 (fax)

etaylor@watsonroach.com

From: Vanessa Baehr-Jones <vanessa@advocatesforsurvivors.com>
Sent: Friday, May 31, 2024 11:09 PM
To: Emily Taylor <etaylor@watsonroach.com>
Cc: Elizabeth Kramer <elizabeth@eko.law>; danny <danny@moorerader.com>; jlakey <jlakey@bpjlaw.com>; kberexa <kberexa@fbb.law>; kgrant <kgrant@rswlaw.com>; Ben C. Allen <ballen@fbb.law>; Maria Ashburn <mashburn@watsonroach.com>; Kevin Osborne <kevin@eko.law>; Julie Erickson <julie@eko.law>; Sandy Vite <sandy@hbm-lawfirm.com>; Andre Greppin <andre@moorerader.com>; L Rufolo <lrufo@rswlaw.com>; Aaron Wells <awells@rswlaw.com>; Erica Russell <erica@hmccivilrights.com>; Linda Oxford <linda@eko.law>; Jessica Dowd <jdowd@fbb.law>; Marie Chrisman <mchrisman@bpjlaw.com>; Heather Collins <heather@hmccivilrights.com>
Subject: Re: BP, HA, and SH v. City of Johnson City et al - Discovery Items - May 28

Emily,

We plan to file the attached documents publicly. We have redacted them thoroughly, but please let me know if you see anything I have missed.

Thank you,

Vanessa

--
Vanessa Baehr-Jones
Founding Partner
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--
Vanessa Baehr-Jones

Founding Partner

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